UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 12 2016

CERTIFIED MAIL 7009 1680 7647 3187
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF

Mr. Bernie Ott
Environmental Engineer
Knapheide Manufacturing Company
436 South 6th Street
Quincy, Illinois 62301

Re: Notice of Violation
Compliance Evaluation Inspection
ILD006263073

Dear Mr. Ott:

On March 9, 2016 representatives of the U.S. Environmental Protection Agency and the Illinois Environmental Protection Agency inspected the Knapheide Manufacturing Company facility located in Quincy, Illinois (KMC). As a small quantity generator of hazardous waste, KMC is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate KMC's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by KMC, EPA's review of records pertaining to KMC, and the inspector's observations, EPA has determined that KMC has unlawfully stored hazardous waste without a permit or interim status as a result of KMC's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(d)-(f) [40 C.F.R. § 262.34(d)-(f)]. EPA has identified the permit exemption condition with which KMC was out of compliance at the time of the inspection in paragraph 1, below.

EPA has also determined that KMC violated RCRA requirements related to hazardous waste determinations and used oil, as described in paragraphs 2 and 3, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS

At the time of the inspection, KMC was out of compliance with the following small quantity generator permit exemption condition:

1. Date When Each Period of Accumulation Begins: Under Ill. Admin. Code tit. 35 § 722.134(d)(4) [40 C.F.R. § 262.34(d)(4)], a small quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, KMC maintained two 55-gallon drums containing D001 characteristic hazardous waste that were not marked with the date upon which each period of accumulation of hazardous waste began. See page 9 and Pictures 10 and 11, and page 10 Pictures 12 and 13, of the enclosed inspection report.

OTHER VIOLATIONS

At the time of the inspection, KMC violated the following generator requirements.

2. Hazardous Waste Determination: Under Ill. Admin. Code tit. 35 § 722.111 [40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous.

   At the time of the inspection, KMC had not made a determination whether the waste generated by using and emptying aerosol cans was hazardous.

   At the time of the inspection, KMC was unable to provide a record documenting the hazardous waste determination for the waste from the bottom of the wastewater treatment tank that is placed in totes and shipped to a wastewater treatment facility.

   At the time of the inspection, KMC was unable to provide a record documenting the hazardous waste determination for the waste floor dust and the waste grinding dust.

3. Used Oil Requirement: Under Ill. Admin. Code tit. 35 § 739.122(c)(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

   At the time of the inspection, a small pail of used oil, located in KMC's slat machine area, was not labeled with the words, "Used Oil." See page 4, Picture 2.

   At the time of the inspection, a 55-gallon drum of used oil, located in KMC's hazardous waste storage area, was not labeled with the words, "Used Oil." See page 11, Picture 14.

EPA CONCERNS

EPA had two additional concerns:

- The annual waste generation amount appeared to increase from 2015 to 2016. We recommend KMC keep a close watch in 2016 and beyond to ensure KMC maintains the correct generator status for the facility.

- At the time of EPA's inspection, KMC was not properly storing universal waste lamps, as described below. KMC is a small quantity handler of universal waste because it accumulates less than 5,000 kilograms of universal waste at any time.

- Universal Waste Requirement: Under Ill. Admin. Code tit. 35 § 733.114(e), a small quantity handler of universal waste must label or clearly mark each lamp or a container or package in which such lamps are contained with any one of the following phrases: "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps."

  At the time of the inspection, KMC's container of lamps was not labeled with the phrase "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps." See page 11 and Picture 15 of the enclosed inspection report.

- Universal Waste Requirement: Under Ill. Admin. Code tit. 35 § 733.114(e), a small quantity handler of universal waste that accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration in any of the following ways:

  - Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;

  - Marking or labeling each individual item of universal waste (e.g., each battery or thermostat) with the date it became a waste or was received;

  - Maintaining an on-site inventory system that identifies the date each universal waste became a waste or was received;

  - Maintaining an on-site inventory system that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received;

  - Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received; or

  - Any other method that clearly demonstrates the length of time that the universal waste has been accumulated from the date it became a waste or was received.

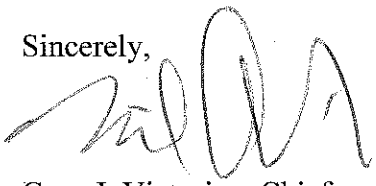
  At the time of the inspection, KMC had not marked the boxes holding universal waste – lamps with the accumulation start date, and was unable to provide records identifying the date when accumulation began for each lamp container. See page 11 and Picture 15 of the enclosed inspection report.

At this time, EPA is not requiring KMC to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the condition for a permit exemption outlined in paragraph 1, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and generator and used oil requirements. You should submit your response Daniel Chachakis, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Chachakis, of my staff, at (312) 886-9871 or at chachakis.daniel@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Mark J, Weber, Illinois EPA (mark.weber@illinois.gov)
Todd Marvel, Illinois EPA, (todd.marvel@illinois.gov)

U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	Knapheide Manufacturing Company
EPA ID NUMBER:	ILD006263073
ADDRESS:	436 South 6th Street Quincy, Illinois 62301
DATE OF INSPECTION:	March 9th, 2016
EPA INSPECTOR:	Daniel F. Chachakis Environmental Protection Specialist (EPS)

PREPARED BY: Daniel Chachakis, EPS — Date: 03/23/2016
Compliance Section 1

APPROVED BY: Michael Cunningham, Chief — Date: 03/23/16
Compliance Section 1

Purpose of Inspection: This inspection was an evaluation of the Knapheide Manufacturing Company's (KMC) compliance with hazardous waste, used oil, and universal waste regulations found at Illinois Title 35 and the Code of Federal Regulations. I performed the inspection with Mark Weber of the Illinois Environmental Protection Agency (IEPA). The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The site notified as small quantity generator (SQG), but was targeted as a possible large quantity generator or a permit evader based on data provided by EPA Headquarters.

Participants

Inspector(s):

Daniel Chachakis, EPS, EPA
Mark Weber, EPS, IEPA

Site Representative(s):

Bernie Ott, Environmental Engineer, KMC
Mr. Scott Wingerter, Supervisor, KMC

Introduction: On March 9th, 2016, the inspectors arrived at the site at approximately 9:10 AM. We introduced ourselves; I presented my inspector credential and Mr. Weber his state identification, and we moved to a table in the employee cafeteria. The onsite personnel called Mr. Ott; Mr. Ott's office was at an offsite KMC facility. When Mr. Ott arrived, we gave him our business cards, and described the purpose and process by which we intended to conduct the inspection. Mr. Ott provided us with a description of the site operations and led the tour. We were led by Mr. Ott to the offsite facility where he provided us with the records we requested for review.

I provided a Small Business Resources information sheet and the Illinois Sustainable Solutions brochure to Mr. Ott. We discussed for the site tour the following safety equipment was recommended or required: safety glasses, steel-toed boots, and hearing protection.

I informed Mr. Ott that KMC could claim any information gathered during the inspection as Confidential Business information including: verbal information, documents and photographs. I told Mr. Ott that I would be taking pictures during the inspection. Mr. Ott stated that KMC would make CBI claims on any pictures specific to the process lines. I did not take any pictures of the process lines as such pictures were not necessary for the purpose of this CEI.

Site Description: Mr. Ott provided a site description. The facility receives overflow work from the larger KMC facility located on 30th Street in Quincy, Illinois. The facility produces toolboxes and compartments for utility trucks.

The facility assembles and uses paint guns to paint the toolboxes and compartments which results in waste metal and a waste paint / solvent mixture. The waste paint / solvent mixture is from the cleaning of the paint guns. Mr. Ott sated there was one onsite hazardous waste storage area, one satellite hazardous waste storage area, and that there were no onsite hazardous waste

storage tanks. We discovered the potential for two hazardous waste storage areas and two satellite accumulation areas onsite during the walkthrough. Mr. Ott estimated that the facility had a shipment of hazardous waste to a TSDF every five weeks. Mr. Ott stated that the painters are responsible for hazardous waste management at the facility, and that there were four painter employees working at the facility at the time of the inspection.

There was an onsite wastewater treatment system. Mr. Ott stated that this system has never produced a "sludge" sent offsite to a solid waste or other landfill. He stated that wastewater is also collected and sent by truck to a second offsite wastewater treatment system. The main issue with the facility's wastewater is with meeting the MDWS zinc requirement; the second is meeting the pH level.

We moved to conduct a site tour.

Site Tour: We observed facility operations including: satellite accumulation areas, the less-than 90-day accumulation containers, solid waste areas, product storage areas, used oil storage, universal waste accumulation, and emergency equipment. I took photographs of the various facility operations, waste operations, and waste storage/accumulation areas during the site tour. Mr. Wingerter joined us for the tour. We moved to the flat bed area.

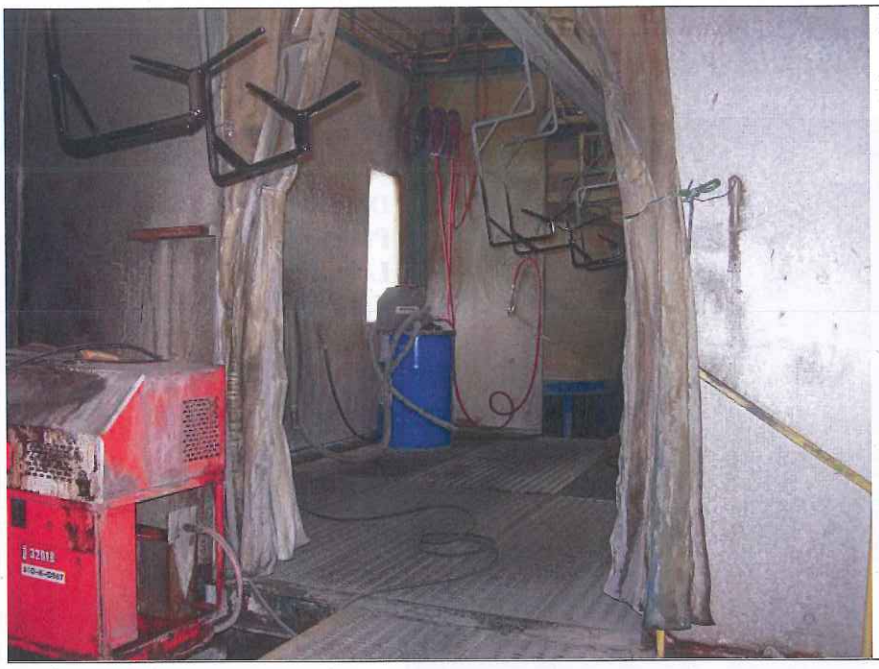
We began at the box building area, and we were able to observe the miscellaneous lid building area. We moved through the station 4 welding area, the floor station, and the assembly area where sides were attached to the floor. We moved through Final Station 1 and Final Station 2, then the cleaning station to the main plant. I observed, and took a picture of, a vacuum (Picture 1). Mr. Wingerter stated the vacuum secures grinding dust from steel grinding operations.

Picture #: 1
[DSCN0027]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: KMC cleaning station
Subject: Vacuum

We continued through the bumper assembly station and the drilling station. Mr. Ott stated that there were universal waste bulbs, but no used batteries or used oil onsite. We eventually did find used oil onsite. We continued to line 612, the observed that line 612 was not in use. We moved to the robot welding area, and observed that the robot welding area was also not in use. We moved to a welding / grinding area that was part of the original building. We observed an area with three operational saws used to cut metal. We observed a chopper machine and a rod threading machine. We observed the slat machine which included an oil skimmer. I observed, and took a picture of, the container holding used oil from the oil skimmer (Picture 2). I observed that the container was not labeled or marked with the words, "Used Oil."

Picture #: 2 [DSCN0028]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Slat machine
Subject: Used oil and container

We moved to, and I observed, the welding training area. Mr. Wingerter departed after observing the welding training area. We continued through a storage area, and tool box assembly area 610. We moved to a Wash Box; Mr. Ott stated that this is the area where KMC generates its wastewater. I observed, and took a picture of, the inside of the box (Picture 3).



Picture #: 3
[DSCN0029]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Wash Box
Subject: Inside the wash box

We continued to the drying oven. We moved to the wastewater treatment system.

Wastewater Treatment System: I observed, and took a picture of, the wastewater treatment system (Picture 4).

Picture #: 4
[DSCN0030]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Wastewater Treatment System Area
Subject: Wastewater Treatment System

I observed that the large tank in Picture 4 was not labeled or marked with the contents of the tank. Mr. Ott stated that wastewater is treated and released to the city system. However, he stated that occasionally KMG empties the bottom of the tank into totes and ships the totes to a

second wastewater treatment system. I observed, and took a picture of, eight totes with material in the totes at the time of the inspection (Picture 5).

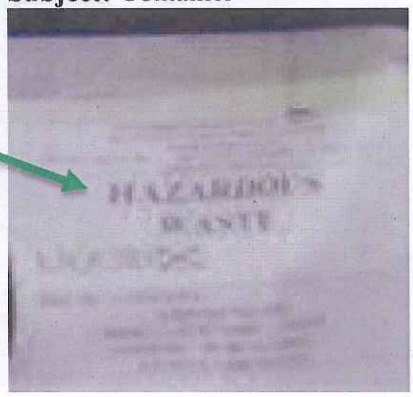
Picture #: 5
[DSCN0031]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Wastewater Treatment System Area
Subject: Totes

I observed that the totes were not labeled or marked with the contents of the totes; I recommended that all containers, totes and tanks be marked or labeled with the contents of the containers. We moved to the prime booth.

Prime Paint Booth: I observed the prime booth, and the presence of two containers within the booth. This booth was in operation and I was unable to enter or take a picture of the two containers. We moved to the Paint Kitchen.

Paint Kitchen: Mr. Ott stated that this was the area where paint and solvent is fed into the painting booths. I observed that there was a very strong solvent smell within the room. I observed the presence of a 55-gallon drum with a hazardous waste label marked with the words, "Liquid Waste, Acetone, MEK, Paint." Mr. Ott stated that the container was a satellite container, and that the container held paint gun waste. I observed that the container was labeled with the words, "Hazardous Waste." I observed that there was an open plug on the lid of the container; Mr. Ott closed the plug at the time of the inspection. I looked inside the container and observed the container was approximately 75% full. We moved outside the room and I took a picture of the container through the doorway (Picture 6).

Picture #: 6
[DSCN0032]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Paint Kitchen
Subject: Container



We moved to the top coat paint booth.

Top Coat Paint Booth: I observed, and took pictures of, two containers within the top coat paint booth (Picture 7s and 8).

Picture #: 7
[DSCN0033]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Top Coat Paint Booth
Subject: Container

Picture #: 8
[DSCN0034]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Top Coat Paint Booth
Subject: Container

I observed that the container in Picture 7 had a cover; I opened and it was approximately 75% full. The container in Picture 8 did not have a cover, and I observed that there was approximately two inches of material covering the bottom of the bucket. I observed that neither container was marked or labeled with the contents of the container. I observed that the location of the containers were in the same areas as the containers in the Prime Paint Booth. We moved to the solid waste storage area.

Solid Waste Storage Area: I observed, and took a picture of, filters in a dumpster (Picture 9).

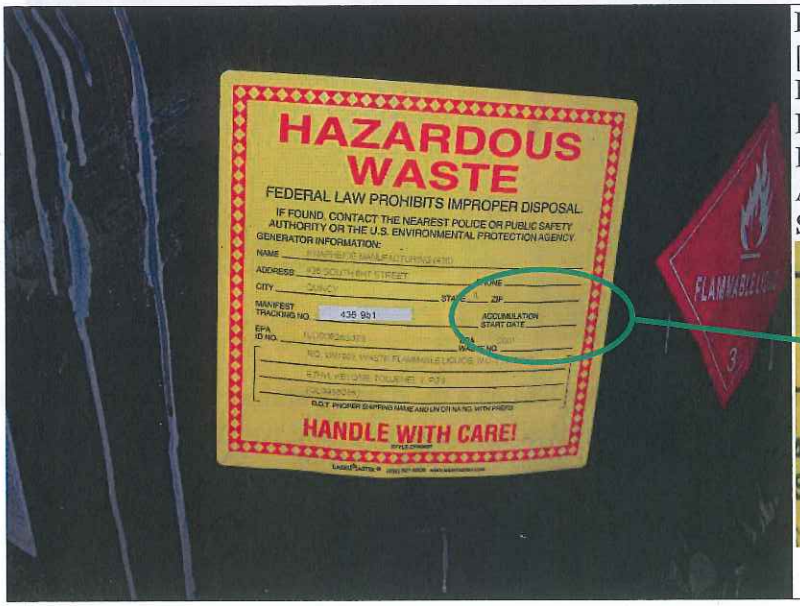
Picture #: 9
[DSCN0035]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Solid Waste Storage Area
Subject: Filters in a dumpster

We moved to the hazardous waste storage area.

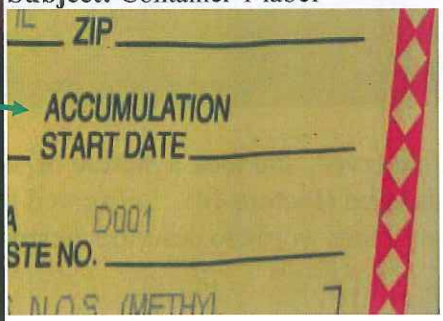
Hazardous Waste Storage Area: I observed, and took pictures of, containers, labels and used oil markings in the hazardous waste storage area (Pictures 10, 11, 12, 13 and 14).

I observed, and took a picture of, a container with a hazardous waste label, marked with the words, "D001" and "Ethyl Ketone, Toluene" (Picture 10, Container 1). I observed that the label was not marked with the accumulation start date, and I took a Picture of the label (Picture 11).

Picture #: 10
[DSCN0036]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area
Subject: Container 1



Picture #: 11
[DSCN0037]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area
Subject: Container 1 label

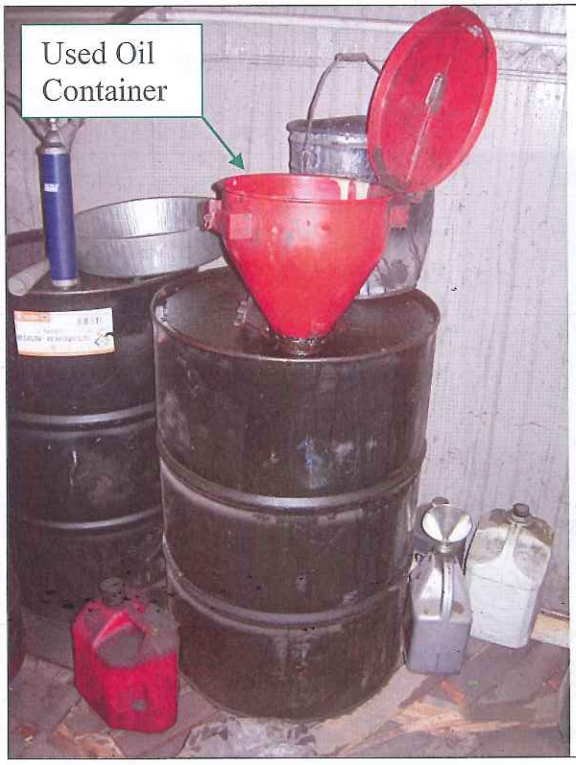


I observed, and took a picture of, a container with a hazardous waste label, marked with the words, "D001" and "Ethyl Ketone, Toluene" (Picture 12, Container 2). I observed that the label was not marked with the accumulation start date, and I took a Picture of the label (Picture 13).

Picture #: 12
[DSCN0038]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area
Subject: Container 2

Picture #: 13
[DSCN0039]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area
Subject: Container 2 label

I observed, and took a picture of, what Mr. Ott described as a used oil container with a red funnel attached (Picture 14). I observed that there was no label or marking of the words, "Used Oil" or any other words to describe the contents of the container.



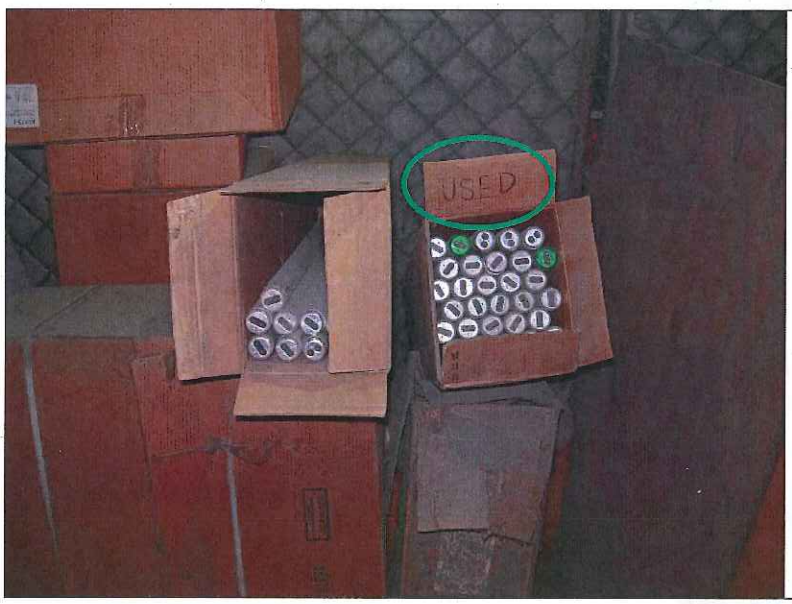
Picture #: 14
[DSCN0040]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area
Subject: Used oil container

We moved up stairs to a second floor maintenance area.

Second Floor Maintenance Area: I observed, and took pictures of, universal waste bulbs and containers (Pictures 15 and 16).

Picture #: 15
[DSCN0041]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Second Floor Maintenance Area
Subject: Universal Waste Bulbs

I observed that one box in Picture 15 was marked with the word, "Used", and that three boxes were marked with the word, "Bad." I observed that the four boxes were not marked with an accumulation start date.



Picture #: 15
[DSCN0042]
Date: March 9, 2016
Photographer: Dan Chachakis
Location: Second Floor Maintenance Area
Subject: Universal Waste Bulbs

I observed that one box in Picture 16 was marked with the word, "Used." I observed that the box was not marked with an accumulation start date.

I asked Mr. Ott about KMF's disposal practices for aerosol cans at this site. Mr. Ott stated that at this site KMC disposes of used aerosol cans as solid waste. We completed the tour, moved to the office, and discussed the location to conduct the records review. I recorded that the hazardous waste records were not located at the KMF 436 South 6th Street facility.

Records Review: We followed Mr. Ott to his office in the KMC facility located at 1848 Westphalia Strassa, Quincy, Illinois. We had an approximately 20 minute drive to the second facility.

I reviewed waste profiles/characterizations, waste analysis records, manifests, land disposal restriction notifications (LDR), and the contingency plan. I completed a SQG checklist(s) during the records review, see Attachment A. I started with the manifests.

Manifests: I observed that manifests were available for at least three years from the time of the inspection. I reviewed, recorded information, and made calculations from the following manifests.

Manifest #	Waste	Containers	Amount	Estimated Kilograms	Facility Signature	Date	Days Between Shipments
013826049JJK	D001/F003/F005	4 drums	220 gallons	800 kg	Bernie Ott	03/03/2016	35 days
013862043JJK	D001/F003/F005	6 drum	330 gallons	1,200 kg	Bernie Ott	01/28/2016	43 days
Totals 2016 to date of CEI:			*550 gallons*	*1 month: 800 kg*	*Average: Unable to determine with two manifests*		
013862035JJK	D001/F003/F005	4 drums	220 gallons	800 kg	Bernie Ott	12/17/2015	37 days
013862030JJK	D001/F003/F005	5 drums	275 gallons	1,000 kg	Bernie Ott	11/10/2015	33 days
013862025JJK	D001/F003/F005	6 drum	330 gallons	1,200 kg	Bernie Ott	10/08/2015	28 days
013862013JJK	D001/F003/F005	8 drums	440 gallons	1,600 kg	Bernie Ott	09/10/2015	43 days
013862006JJK	D001/F003/F005	5 drums	275 gallons	1,000 kg	Bernie Ott	07/30/2015	36 days
011684478JJK	D001/F003/F005	4 drums	220 gallons	800 kg	Bernie Ott	06/25/2015	29 days
011684472JJK	D001/F003/F005	8 drums	440 gallons	1,600 kg	Bernie Ott	05/28/2015	36 days
011684422JJK	D001/F003/F005	6 drum	330 gallons	1,250 kg	Bernie Ott	04/23/2015	36 days
013862013JJK	D001/F003/F005	8 drums	440 gallons	1,600 kg	Bernie Ott	03/19/2015	43 days
011684149JJK	D001/F003/F005	8 drums	440 gallons	1,600 kg	Bernie Ott	02/05/2015	49 days
Totals 2015			*4,519 gallons*	*11 months: 10,850 kg*	*February through December Manifests 11 months of generation: 986 kilograms per month*		
011684095JJK	D001/F003/F005	6 drum	330 gallons	1,200 kg	Bernie Ott	12/19/2014	37days
011684043JJK	D001/F003/F005	6 drum	330 gallons	1,200 kg	Bernie Ott	11/13/2014	34 days
011683988JJK	D001/F003/F005	6 drum	330 gallons	1,200 kg	Bernie Ott	10/10/2014	36 days
011683959JJK	D001/F003/F005	4 drums	220 gallons	800 kg	Bernie Ott	09/04/2014	36 days
011683910JJK	D001/F003/F005	6 drum	330 gallons	1,200 kg	Bernie Ott	07/29/2014	42 days
011683864JJK	D001/F003/F005	5 drums	275 gallons	1,000 kg	Bernie Ott	06/17/2014	36 days
011683857JJK	D001/F003/F005	3 drums	165 gallons	600 kg	Bernie Ott	05/12/2014	31 days
011683812JJK	D001/F003/F005	4 drums	220 gallons	800 kg	Bernie Ott	04/11/2014	29 days
011683757JJK	D001/F003/F005	7 drums	385 gallons	1,400 kg	Bernie Ott	03/13/2014	48 days
011683717JJK	D001/F003/F005	7 drums	385 gallons	1,400 kg	Bernie Ott	01/24/2014	
Totals 2014			*2,970*	*11 months: 9,400*	*February through December Manifests 11 months of generation: 854 kilograms per month*		

Calculation Factors

- Density Factor: 8
  - Toluene: 0.8669 g/mL (7.234 lb./gal) at 20°C (68°F)
  - Methyl Ethyl Ketone0.8049 g/mL (6.717 lb./gal) at 20°C (68°F)
  - Average density of waste paint = 10 pounds per gallon
  - Therefore, solvent average of 6.975, plus a factor for waste paint = 8
- Pound to Kilogram Conversion: 2.2 pounds = 1 kilogram

Waste Determinations: Waste determinations were available for review.

- The Paint Filter Determination, dated May 31, 1996, showed chromium was present at 25.5 mg/l, making the solid waste a hazardous waste. However, Mr. Ott stated the process had changed, and that chromium is no longer a factor. Mr. Ott was not able to provide documentation of the change or an analysis showing the Paint Filters were no longer a hazardous waste at the time of the inspection. The analysis in question was

submitted to, and accepted by, a solid waste landfill in 1999 in support of a non-hazardous solid waste certification. Mr. Ott provided me with a copy of the certification, A2LA Certification No. 724.01, *see* Attachment D, document KMC001.

- Mr. Ott was unable to provide a waste determination for the grinding / floor dust / shavings waste at the time of the inspection.

Closing Conference: We summarized the following issues identified during the inspection.

- Records for the 6th street facility are located at the Westphalia Strassa facility.
- The use of satellite containers and the designation of hazardous waste storage area(s).
- Accumulation start dates.
- Marking or labeling containers of used oil.
- Marking or labeling containers with material in the containers, including the totes, tank, and containers in the facility that were not marked or labeled with the contents of the containers or tank.
- Waste determination for the waste filters.
- Waste determination requirement for the grinding / floor dust / shavings waste, and that it may be an Illinois special waste.
- Managing waste aerosol cans.
- The overwhelming solvent smell in the Paint Kitchen room.

I provided a Used Oil information sheet to Mr. Ott. I again mentioned that KMC could make claims of CBI on the material copied, photographs, and information gathered during the inspection. Mr. Ott did not make any CBI claims. The inspection concluded at approximately 1:45 PM.

Attachments

A. Checklist
B. Document(s) Copied

ATTACHMENT A
Checklists

Knapheide Mfg Co 03/09/2016

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO SMALL-QUANTITY GENERATORS OF HAZARDOUS WASTE (100 - 1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	**Section 722.111 Hazardous Waste Determination** Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? But: Haz to nonhaz Yes____ No X N/A____ Have hazardous wastes been identified for purposes of compliance with Part 728? Yes X No____ N/A____	722.111 X
808.121(a)	Has the generator correctly determined if the solid waste it generates is a special waste? Yes____ No____ N/A X	808.121(a)
722.112(a)	**Section 722.112 USEPA Identification Numbers** Has the generator obtained a USEPA identification number? Yes X No____ N/A____	– 722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes X No____ N/A____	722.112(c)
	SUBPART B: THE MANIFEST	
722.120(a)	**Section 722.120 General Requirements** Does the facility manifest its waste off-site? Yes X No____ N/A____ If "No", proceed to Section 722.120(e).	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes X No____ N/A____	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes____ No____ N/A X	722.120(d)
722.120(e)	Does the generator reclaim waste through a contractual agreement with a recycling facility in which: – the type of waste and frequency of shipments are specified in the agreement? Yes____ No____ N/A X – the vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste? Yes____ No____ N/A X – the generator has maintained a copy of the agreement for 3 years after termination or expiration of the agreement? Yes____ No____ N/A X	722.120(e)
728.107(a 10)	Has a small-quantity generator with a tolling (contractual) agreement pursuant to Section 722.120(e) retained on site a copy of the notification and certification of the initial waste shipment together with the tolling agreement for at least **3 years** after the termination or expiration of the agreement? Yes____ No____ N/A X	728.107(a)(10)
722.121(a)	**Section 722.121 Acquisition of Manifests** Has the generator used: – an ~~Illinois~~ manifest for wastes designated to a facility within Illinois? uniform Yes X No____ N/A____	722.121(a)
722.121(b)	– a manifest from the State to which the manifest is designated? Yes____ No____ N/A X – an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes____ No____ N/A X	722.121(b)
722.122	**Section 722.122 Number of Copies** Does the manifest consist of at least 6 copies? Yes X No____ N/A____	722.122

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator:	
722.123(a)	– signed the certificate by hand? Yes X No ____ N/A ____	722.123(a)
	– obtained the handwritten signature and the date of acceptance by the initial transporter? Yes X No ____ N/A ____	
	– retained one copy as required by Section 722.140(a)? Yes X No ____ N/A ____	
	– apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes X No ____ N/A ____	
722.123(b)	– has the generator apparently given the remaining copies to the transporter? Yes X No ____ N/A ____	722.123(b) –
722.123(c)	– has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes ____ No ____ N/A X	722.123(c)
	SUBPART C: PRE-TRANSPORT REQUIREMENTS Is there any hazardous waste ready for transport off-site? Yes ____ No X N/A ____ If so, is the generator complying with the pre-transport requirements in Subpart C? Yes ____ No ____ N/A X	
722.134(c)	**Section 722.134 Accumulation Time** Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste limiting such accumulation to 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste marking the containers with the words hazardous waste or other words to identify the contents? 2 Containers in Prime Booth, 2 in Paint Booth Yes ~~X~~ DFC No X N/A ____	722.134(c) X
	Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes ____ No ____ N/A X	
	If there are more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes ____ No ____ N/A X	
	During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes ____ No ____ N/A X	
722.134(d)	Has the generator complied with the following requirements: Yes ____ No ____ N/A X	722.134(d)
	Note: If the quantity of hazardous waste on-site ever exceeds 6000 kg, the facility is also a storage facility subject to full regulation under Parts 724 and 725 and the permit requirements under Part 703. Does the facility accumulate hazardous waste in containers? Yes ____ No ____ N/A X If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(722.134a2)	Is the accumulation start date marked on each container? 2 Containers Yes ____ No X N/A ____	X
(722.134a3)	Is each container marked with the words "Hazardous Waste"? Yes X No ____ N/A ____	
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes ____ No ____ N/A X	

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.272)	Is the waste compatible with the container and/or liner? Yes X No N/A	
(725.273a)	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Open at time of inspection Yes No X N/A	X
(725.273b)	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes X No N/A	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Daily Yes X No N/A	
	Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes X No N/A	-
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes No N/A X	
	Does the generator accumulate and/or treat hazardous waste in tanks? Yes No X N/A	
	Note: If "No", go to Subpart C.	
	COMMENTS:	
	SUBPART J: TANK SYSTEMS	
	Section 725.301 Generators of 100 to 1000 kg/mo.	
(722.134a2)	Is each tank marked with the words "Hazardous Waste"? Yes No N/A	-
(725.301b1)	Is the generator in compliance with the treatment or storage of hazardous waste in tanks as referenced in Section 725.117(b)? Yes No N/A	
(725.301b2)	Have hazardous wastes or treatment reagents been placed in a tank causing the tank or its inner liner to rupture, leak, corrode or otherwise fail before the end of its intended life? Yes No N/A	
(725.301b3)	Unless a tank is equipped with drainage control or a diversion structure, do any uncovered tanks have at least 2 feet of freeboard? Yes No N/A	
(725.301b4)	If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow (i.e. waste feed cutoff system or by-pass system to a stand-by tank)? Yes No N/A	

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.301c)	Is the generator inspecting, where present, the following: 1) discharge control equipment at least once each operating day? Yes_____ No_____ N/A_____ 2) data from monitoring equipment at least once each operating day? Yes_____ No_____ N/A_____ 3) the level of the waste in the tank at least once each operating day? Yes_____ No_____ N/A_____ 4) physical evidence of corrosion at least weekly? Yes_____ No_____ N/A_____ 5) discharge confinement structures to detect erosion or leaking at least weekly? Yes_____ No_____ N/A_____	
(725.301d)	Has the generator removed all hazardous waste from tanks and associated equipment and structures upon closure of the facility? Yes_____ No_____ N/A_____	
(725.301e)	If ignitable or reactive wastes are stored in tanks, is the generator in compliance with Section 725.301(e)? Yes_____ No_____ N/A_____	
(725.301f)	Is the generator in compliance with the regulations concerning incompatible wastes in Section 725.301(f)? Yes_____ No_____ N/A_____	
	COMMENTS:	
	SUBPART C: PREPAREDNESS AND PREVENTION	
(725.131)	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes_X_ No_____ N/A_____	
(725.132)	Is the facility equipped with the following if necessary: a) an internal communication or alarm system(s)? Air horns Yes_X_ No_____ N/A_____ b) a telephone or other device to summon emergency assistance from local authorities? Yes_X_ No_____ N/A_____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes_X_ No_____ N/A_____ d) water at adequate volume and pressure for fire control? Yes_X_ No_____ N/A_____	
(725.133)	Is the facility testing and maintaining communication/alarm systems, fire protection equipment, spill control equipment and decontamination equipment? Yes_X_ No_____ N/A_____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes_X_ No_____ N/A_____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes_____ No_____ N/A_X_	
(725.135)	Is the facility maintaining adequate aisle space? Yes_X_ No_____ N/A_____	

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: – arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes X No N/A – agreements designating the primary authority where more than one police or fire department might respond? Fire Dept Primary Yes No N/A X – agreements with State emergency response teams, contractors and equipment suppliers? Yes X No N/A – arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes X No N/A	–
(728.107a4)	**Section 728.107 Waste Analysis and Recordkeeping** Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes No N/A Is the plan on-site? Yes No N/A Does the plan include a detailed physical and chemical analysis? Yes No N/A Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes No N/A Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes No N/A	
722.134(d)(5)	A) Is there at least one employee on site or on call with the responsibility to coordinate all emergency response measures? Yes No N/A B) Is the following information posted next to the telephone: – the name and telephone number of the emergency coordinator? Yes No N/A – the location of fire extinguishers and spill control equipment and, if present, fire alarms? Yes No N/A – the number of the fire department unless the facility has a direct alarm? Yes No N/A C) Have employees received the proper waste handling and emergency procedures training relevant to their positions? Yes No N/A D) If there have been any emergencies that required a response, did the emergency coordinator comply with the requirements of Section 722.134(d)(5)(D)? Yes No N/A	722.134(d)(5)
	Note: A small-quantity generator who must transport the waste over a distance of 200 miles or more for treatment, storage or disposal may accumulate waste on-site for up to 270 days without a permit provided that the generator complies with the requirements of subsection (d).	
	SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a)	**Section 722.140 Recordkeeping** Has the generator retained for a period of 3 years: – a copy of each signed manifest? Yes X No N/A	722.140(a)
722.140(c)	Has the generator retained for a period of 3 years: – copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes X No N/A	722.140(c)

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes_____ No_____ N/A X	722.140(d)
722.142(b)	**Section 722.142 Exception Reporting** Has the generator filed an exception report if a signed copy of the manifest has not been received within 60 days of the date of delivery to the transporter? Yes_____ No_____ N/A X	722.142(b)
722.143	**Section 722.143 Additional Reporting** Has the generator furnished additional reports as required by the Director? Yes_____ No_____ N/A X	722.143
	SUBPART E: EXPORTS OF HAZARDOUS WASTE Is the generator an exporter of hazardous waste? Yes_____ No_____ N/A X If "Yes", has the generator complied with the requirements of Subpart E? Yes_____ No_____ N/A X	
	SUBPART F: IMPORTS OF HAZARDOUS WASTE Is the generator an importer of hazardous waste? Yes_____ No_____ N/A X If "Yes", has the generator complied with the requirements of Subpart F? Yes_____ No_____ N/A X	
	SUBPART G: FARMERS Is the generator a farmer? Yes_____ No_____ N/A X If "Yes", has the generator complied with the requirements of Subpart G? Yes_____ No_____ N/A X COMMENTS:	

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ATTACHMENT B
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Summit Environmental Technologies, Inc.
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A2LA CERTIFICATION NO. 724.01

Offices in Major U.S. Cities

s.e.t.

May 31, 1996

1

The Knapheide Manufacturing Co.
436 S. 6th Street
Box C-140
Quincy, IL 62306

Date Collected: 5/20/96
Date Received: 5/22/96
Laboratory ID #: 96638-01
Project #: (P.O. # 462955)
Client ID #: Paint Filters at Platform Steel Booth
Plant Location 1701 N. 16th St.
Extraction Method: 1311
Date of Analysis: 5/25-28/96

TCLP Metals

Parameter	Detection Limit (mg/l)	Results (mg/l)	Regulatory Level (mg/l)
Silver	0.01	< 0.01	5
Lead	0.1	0.2	5
Cadmium	0.005	< 0.005	1
Chromium	0.05	25.5	5
Arsenic	0.1	< 0.1	5
Mercury	0.002	< 0.002	0.2
Barium	0.1	< 0.1	100
Selenium	0.2	< 0.2	1

Laboratory Manager: Bassam Youssef

Knapheide Mfg Co.
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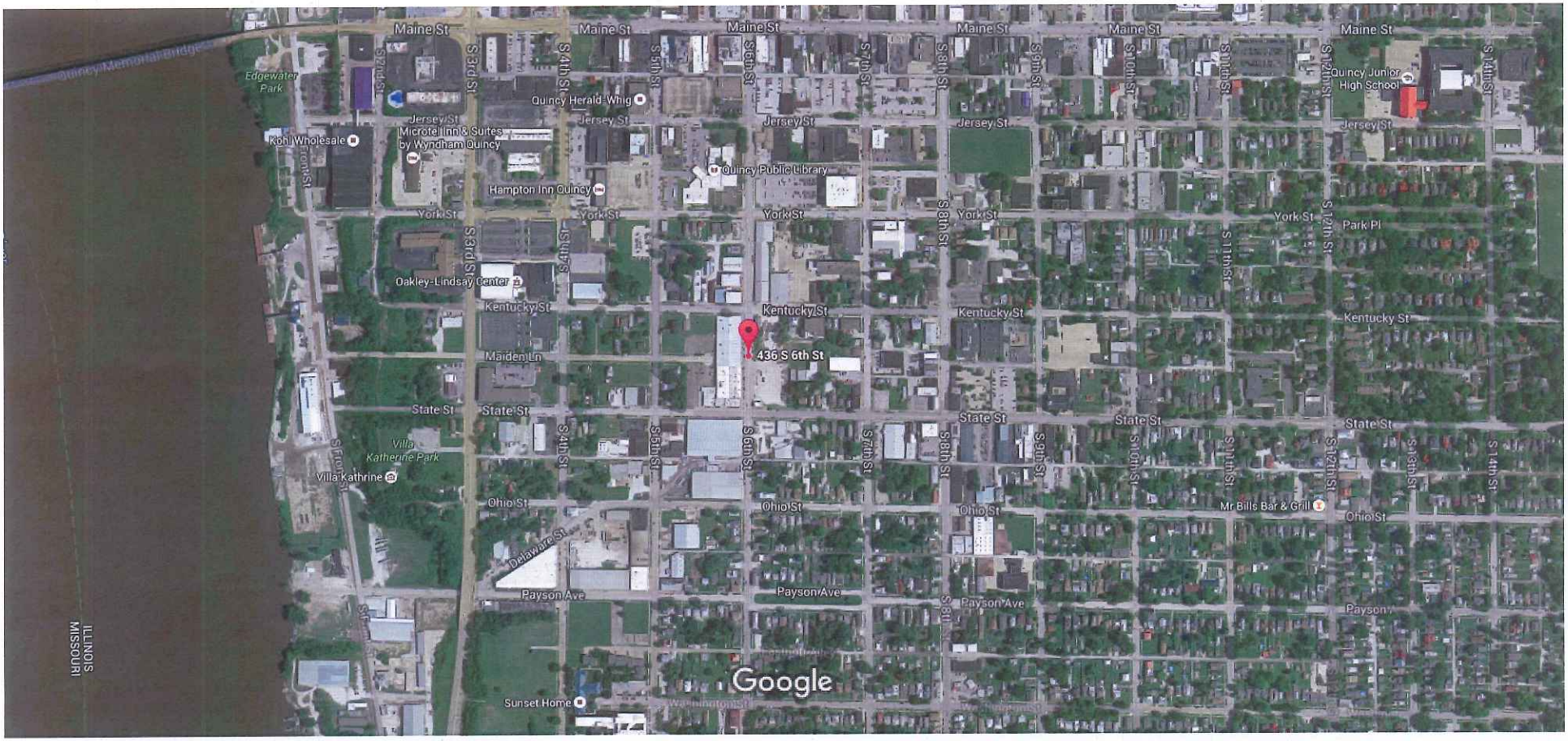
Google Maps 436 S 6th St



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436 S 6th St
Quincy, IL 62301

At this location

Care Net Pregnancy Services of Quincy
Adoption Agency · S 6th St

Young Life
Youth Organization · S 6th St

Google Maps

Google Maps S 6th St

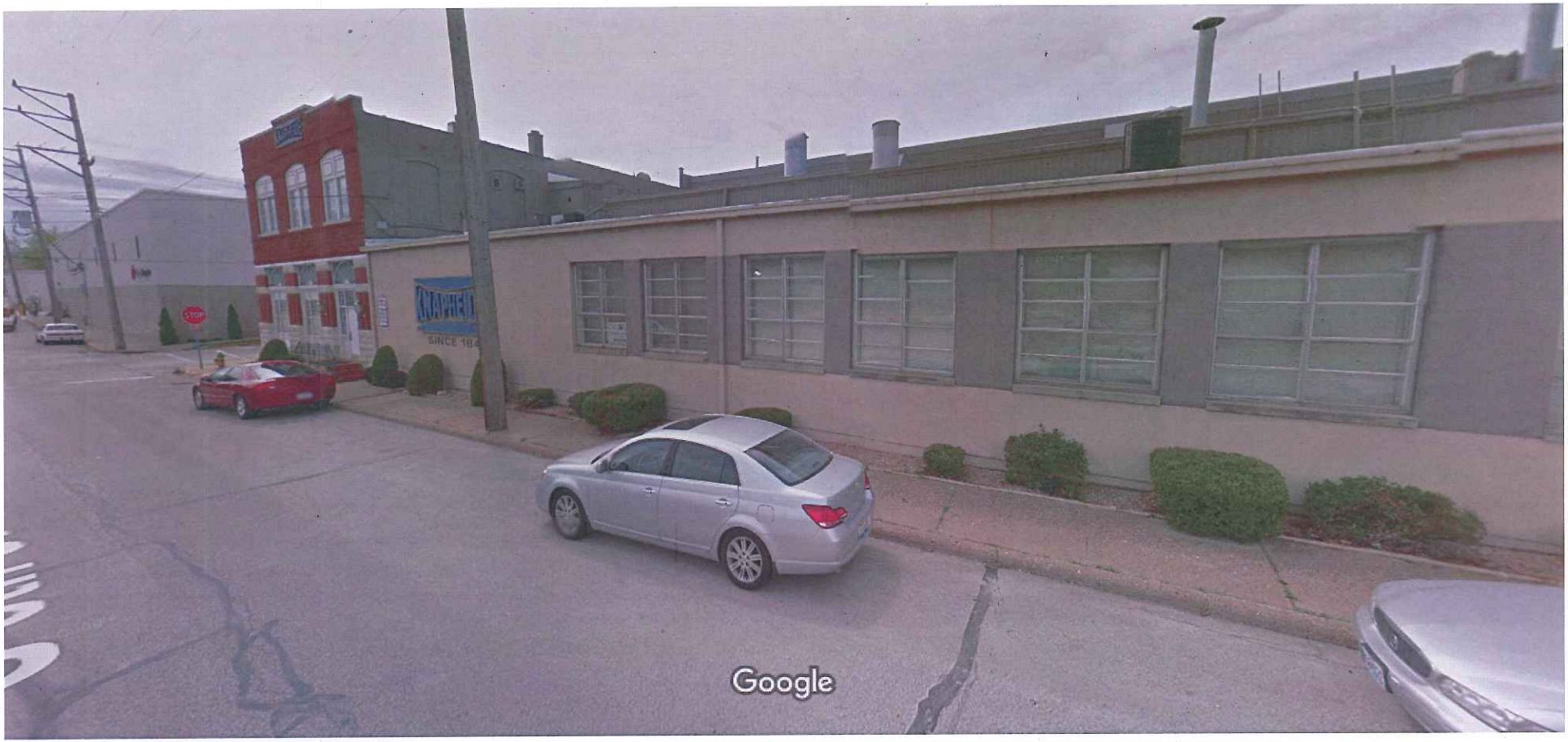

Image capture: Apr 2012 © 2016 Google

Quincy, Illinois

Street View - Apr 2012


Google Maps
S 5th St
York St
Kentucky St
Maiden Ln
436 S 6th St
State St
S 5th St
S 6th St
S 7th St
S 8th St
Ohio St
Payson Ave